

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: CLAYTON PRINCE AND
BRENDA PRINCE**

CHAPTER 13

DEBTORS

CASE NO. 18-12343 JDW

RESPONSE TO TRUSTEE'S MOTION TO DISMISS [DOCUMENT NO. 29]

COME NOW Debtors, Clayton Prince and Brenda Prince, by and through their attorney of record and in response to the Trustee's Motion To Dismiss and would show as follows:

Debtor was on medical leave several months ago which created an ongoing delinquency. Due to the debtor not having any income, she was unable to make her plan payments. Debtors respectfully requests their case not be dismissed and requests that any arrearage be added back into their plan.

WHEREFORE, PREMISES CONSIDERED, Debtors pray, upon a hearing hereon, this Court deny Trustee's Motion To Dismiss. Debtors pray also for such other relief, general or specific, to which he may be entitled.

RESPECTFULLY SUBMITTED,

/s/ Robert H. Lomenick
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ATTORNEY AT LAW
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CERTIFICATE OF SERVICE

I, Robert H. Lomenick, Attorney for Debtors, do hereby certify that I have this day forwarded, a true and correct copy of the above and foregoing Response To Motion To Dismiss to the Debtors, either by electronic means or by United States Mail to the following:

**Locke Barkley
Chapter 13 Trustee
6360 I-55 North, Ste. 140
Jackson, Mississippi 39211**

**Office of U.S. Trustee
501 East Court Street, Suite 6-430
Jackson, Mississippi 39201**

This the 18th day of December, 2019.

/s/ Robert H. Lomenick
ROBERT H. LOMENICK